

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JANE DOE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 22-cv-01032
UNIVERSITY OF CHICAGO,	)	
UNIVERSITY OF CHICAGO MEDICAL	)	
CENTER, SAUL LEVMORE,	)	Hon. John F. Kness
THOMAS MILES, MICHELE	)	
RICHARDSON, MICHAEL SCHILL,	)	
ABBIE WILLARD AND DAVID ZARFES,	)	
	)	
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE  
THE JOINT INITIAL STATUS REPORT**

Defendants University of Chicago, University of Chicago Medical Center, Saul Levmore, Thomas Miles, Michele Richardson, Michael Schill, Abbie Willard, and David Zarfes, through their attorneys Cozen O'Connor, respectfully request that this Court extend the deadline to file the joint initial status report from June 8, 2022 to June 15, 2022, and in support of this Motion state as follows:

1. In its April 29, 2022 minute entry (Doc. 19), this Court ordered the parties to submit their joint initial status report within seven days of the resolution of the parties' pending appeal. That appeal was resolved on June 1, 2022,<sup>1</sup> making the parties' joint status report due on June 8, 2022.
2. Since the resolution of the appeal, Defendants' counsel and Plaintiff have been unable to confer despite the parties' diligent efforts to do so. Defendants' counsel called Plaintiff on June 3 and June 6 and left her a voicemail. Plaintiff was unable to return Defendants' counsel's phone call

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<sup>1</sup> See *Jane Doe v. University of Chicago, et. al.*, 22-493, pending in the 2d Circuit Court of Appeals, Doc. 53.

on either of those days because of her religious commitments brought about by Jewish holidays. Defendants' counsel and Plaintiff traded voicemails on June 7, and Defendants' counsel was not able to speak to Plaintiff until the morning of June 8, when Plaintiff informed him that she will be unable to confer about the joint status report until the evening of June 8 because of work commitments related to a new job that she has recently started.

3. Prior to April 29, 2022, the original deadline to file the initial joint status report, the parties met several times over Zoom and drafted a status report. When the parties spoke on June 8, Plaintiff informed Defendants' counsel that she would like to make additional revisions to this draft, which may require the parties to meet on more than one occasion.

4. Therefore, the parties respectfully request that this Court grant them a brief seven-day extension to file the joint status report, moving the deadline to file the report from June 8, 2022 to June 15, 2022. Such an extension will allow the parties to accommodate Plaintiff's work schedule and meet on more than one occasion, if necessary, to address the changes that Plaintiff seeks to make to the joint status report. This brief extension will not delay the resolution of this proceeding and will not prejudice either party.

Respectfully submitted,

By: /s/ Matthew DiCianni  
One of Defendants' Attorneys

Anneliese Wermuth  
Matthew DiCianni  
Cozen O'Connor  
123 N. Wacker Dr. Suite 1800  
Chicago, IL 60606  
Telephone: 312-474-7876  
awermuth@cozen.com  
mdicianni@cozen.com

Dated: June 8, 2022

**CERTIFICATE OF SERVICE**

I, Matthew DiCianni, an attorney, hereby certify that on June 8, 2022, a copy of the **Defendants' Unopposed Motion for an Extension of Time to File the Joint Initial Status Report** was filed electronically with the Clerk of the Court using the CM/ECF system. The parties may access this filing through the Court's electronic filing system.

/s/ Matthew DiCianni